UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

ALAN DERSHOWITZ,

Defendant.

ALAN DERSHOWITZ,

Counterclaim Plaintiff,

v.

VIRGINIA L. GIUFFRE,

Counterclaim Defendant.

Civil Action No. 19-cv-03377-LAP

PROPOSED ORDER

LORETTA A. PRESKA, Senior United States District Judge:

Further to the Court's Order dated February 14, 2022 regarding the relevance and discoverability of certain settlements entered into by the parties (Dkt. No. 401), this Court hereby **ORDERS** (i) that notice of this Order shall be promptly provided to the parties (apart from Plaintiff Virginia Giuffre) as identified in the Settlement Agreement reached in the matter of *Giuffre v. Maxwell*, Civil Action No. 15-07433; (ii) that such notice shall inform the *Maxwell* parties that they have one week to file objections, if any, to the disclosure of the Settlement Agreement to the Defendant in this action; and (iii) that if no objections are filed by any party that Plaintiff shall promptly produce a copy of the Settlement Agreement including documents sufficient to show the amount of such settlement. Any such documents shall be produced in their

unreducted form and shall be produced confidentially pursuant to the Protective Order entered into by the parties in this case on December 21, 2020 (Dkt. No. 227).

For Plaintiff: For Defendant: /s/ Howard M. Cooper /s/ Nicole J. Moss Charles J. Cooper* Howard M. Cooper* Christian G. Kiely* Michael W. Kirk Nicole J. Moss* Kristine C. Oren* Haley N. Proctor* TODD & WELD LLP COOPER & KIRK PLLC One Federal Street, 27th Fl. 1523 New Hampshire Ave. NW Boston, MA 02110 Washington, D.C. 20036 (617) 720-2626 (202) 220-9600 hcooper@toddweld.com ccooper@cooperkirk.com ckiely@toddweld.com mkirk@cooperkirk.com koren@toddweld.com nmoss@cooperkirk.com *Admitted PHV hproctor@cooperkirk.com *Admitted PHV Arthur L. Aidala (S.D.N.Y. Bar No. ALA-0059) Imran H. Ansari (S.D.N.Y. Bar No. IHA-1978) AIDALA, BERTUNA & KAMINS, P.C. Attorneys for Plaintiff Virginia Giuffre 546 Fifth Avenue, 6th Floor New York, NY 10036 (212) 486-0011 iansari@aidalalaw.com aidalesq@aidalalaw.com Attorneys for Defendant Alan Dershowitz SO ORDERED AND SIGNED this ___ day of _____, 2022. Hon. Loretta A. Preska

Senior United States District Judge